

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Harrisburg Division

IN RE:
TROY L. JOHNS
CHANTILLY L JOHNS

Case No. 1:19-bk-02607-HWV
Chapter 13

FREEDOM MORTGAGE CORPORATION,
Respondent

vs.
TROY L. JOHNS
CHANTILLY L JOHNS,
Debtors

**OBJECTION TO CONFIRMATION
OF DEBTORS' CHAPTER 13 PLAN**

FREEDOM MORTGAGE CORPORATION ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtors' Chapter 13 Plan* (Doc 66), and states as follows:

1. The Debtors filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on June 14, 2019.
2. Movant holds a security interest in the Debtor(s)' real property located at 8380 Harper Drive, Waynesboro, PA 17268 (the "Property"), by virtue of a Mortgage which is recorded in Official Records of Franklin County, Pennsylvania. Said Mortgage secures a Note in the amount of \$288,000.00.
3. The Debtors filed a Motion to Modify with Debtor's 5th Amended Chapter 13 Plan (the "Plan") on December 1, 2021 (Doc 66).

4. Movant filed a Proof of Claim in this case on January 28, 2020 (Claim No. 6-2) with a secured claim of \$291,106.51 and Pre Petition arrears in the amount of \$8, 693.72.

5. The Plan includes payments toward the Note and Mortgage with Movant and lists prepetition arrears in the amount of \$14,451.91. The Debtors also include post petition arrears in the amount of \$14,451.91 without an agreement or permission of the Respondent.

6. Respondent objects to Debtor's Amended Plan with the listed post petition arrears without a docketed agreement for the post petition arrears.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/ Mario Hanyon

Mario Hanyon

(Bar No. 203993)

Attorney for Creditor

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection To Confirmation Of Debtors' Chapter 13 Plan has been electronically served or mailed, postage prepaid on this day to the following:

CHANTILLY L JOHNS
8380 HARPER DR
WAYNESBORO, PA 17268-8474

Mark Buterbaugh, Debtor's Attorney
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January 3, 2022

/s/ Mario Hanyon
Mario Hanyon
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